

1 BARRY J. PORTMAN
2 Federal Public Defender
2 RONALD C. TYLER
3 Assistant Federal Public Defender
3 450 Golden Gate Avenue
4 San Francisco, CA 94102
4 Telephone: (415) 436-7700

5 Counsel for Defendant MOLLY KATZEFF

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) No. CR 09-0754 MAG
12 Plaintiff,) STIPULATION AND [PROPOSED]
13 v.) ORDER CONTINUING STATUS
14 MOLLY KATZEFF,) HEARING EXCLUDING TIME
15 Defendant.) UNDER 18 U.S.C. § 3161
16 _____)

17
18 STIPULATION

19 The parties are scheduled to appear before this Court on October 28, 2009 at 1:30 p.m. for a status
20 hearing. The reason for the continuance is defense counsel has another appearance in Oakland and
21 requests that this matter be continued to November 25, 2009. The next available court date for all
22 parties is November 25, 2009. The government has no objection to this request.

23 The parties also agree that the time between October 28, 2009 and November 25, 2009 should
24 be excluded under the Speedy Trial Act. The continuance is necessary for effective preparation of
25 counsel and continuity of counsel, 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv), and the ends of
26

STIPULATION AND [PROPOSED] ORDER
U.S. v. Molly Katzeff
CR 09-0754 MAG

1 justice served by granting such a continuance outweigh the best interests of the public and the
2 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

3 SO STIPULATED:

4 JOSEPH P. RUSSONIELLO
5 United States Attorney

6 DATED: October 27, 2009

7 _____
8 /s/
9 ACADIA SENESE
10 Special Assistant United States Attorney

11 DATED: October 27, 2009

12 _____
13 /s/
14 RONALD C. TYLER
15 Assistant Federal Public Defender
16 Counsel for Molly Katzeff

17 **[PROPOSED] ORDER**

18 For the reasons stated above, the Court finds that the continuance of time for the next hearing
19 at 8:45 a.m.
20 before this court from October 28, 2009 to November 25, 2009 is warranted because the failure to
21 grant the requested continuance would deny the defendant effective preparation and continuity of
22 counsel; thus, the ends of justice served by the continuance outweigh the best interests of the public
23 and the defendant in a speedy trial. 18 U.S.C. § 3161 (h)(7)(A), (h)(7)(B)(iv).

24 SO ORDERED.

25 DATED: Oct. 27, 2009

26 
THE HONORABLE BERNARD ZIMMERMAN
United States Magistrate Judge